



STATE OF NEW MEXICO
MAGGIE TOULOUSE OLIVER
SECRETARY OF STATE

July 2, 2020

Stephen P. Curtis
6747 Academy Road NE, Suite D
Albuquerque, NM 87109
abqcurtis@gmail.com

RE: Application for 2020 Primary Election Recount

Dear Mr. Curtis:

We received your letter requesting a statewide recount for the Libertarian Party on June 29, 2020, pursuant to NMSA 1978, Section 1-14-14(A) & (B) (2018). Then on July 1, 2020, you sent a second email amending your request to include seven specific counties for the recount. On July 1, 2020, we received the wire transfer in the amount of \$23,800, for the purpose of covering the proceedings, as required by Section 1-14-15.

Upon review, we have determined that your application for recount was not timely or complete. Your first application did not include the deposit or surety bond required to be provided under Section 1-14-15(A). Your second application on July 1, 2020 was not timely as it was not within six days of the after completion of the canvass as required under Section 1-14-14(A). In addition, the amount you did deposit on July 1, 2020 was not sufficient to cover the cost of the recount for the selected precincts.

The determination of cost for a recount, as approved by the State Canvass Board, sets the estimated cost at \$3,400 per precinct. The amount you submitted is \$3,400 **per county**, which is insufficient for the several hundred precincts included in these seven counties. For this reason, your application for recount is denied.

Sincerely,

Tonya Noonan Herring

Tonya Noonan Herring
General Counsel

Exhibit 8